

February 6, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: segTEL, Inc.
Certification of CPNI Filing (February 6, 2006)
EB Docket No. 06-36
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers' protection of the privacy of customer proprietary network information ("CPNI"),² segTel, Inc. (the "Company") submits this Compliance Statement and Certificate. Protecting CPNI is an important obligation for all telecommunications carriers and the Company has adopted various operational procedures to assure that all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

As requested by the Public Notice, the undersigned, as an officer of the Company, certifies based upon personal knowledge that the following Compliance Statement describes the operational procedures and policies implemented by the Company to ensure the privacy of its customers' CPNI consistent with the Commission's CPNI rules.

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2001, *et seq.*.

STATEMENT OF COMPLIANCE WITH CPNI RULES

The Company is a facilities-based provider of advanced, integrated packages of communications services to customers in moderately-populated areas of New England. The Company provides a variety telecommunications services on a wholesale basis to other telecommunications carriers and on a retail basis to enterprise customers. These services include various forms of managed connectivity, hosting, private line services, collocation services, internet access and fiber to the premises. The Company continues to expand its fiber network throughout the New England states bringing competitive and advanced telecommunications services to many underserved and rural areas.

Except as described below, the Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Thus, except as described below, the Company does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. For example, the Company uses, discloses or permits access to CPNI for marketing purposes in the context of marketing its local service offerings to existing local customers. Thus, the Company may use CPNI to market a higher capacity circuit to a carrier customer that is overutilizing its existing circuit(s). In addition, as permitted by the CPNI rules, the Company uses CPNI (1) to initiate, render, and bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services.

In certain limited circumstances, the Company shares CPNI with prospects in response to a request for proposal ("RFP") for telecommunications services. For instance, the Company provides telecommunications services to large institutions and government agencies who, as part of the RFP, request information about similarly situated existing Company customers. In these instances, prior to sharing customer CPNI with any prospect, the Company contacts the existing customer and obtains its express affirmative consent to share CPNI with the prospect. The Company maintains for at least one year a record of such customer's assent. Except for the purposes described above, the Company does not share, sell, lease or otherwise provide CPNI to any unrelated third parties without affirmative consent from the customer.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. Employees who violate the Company's Code of Conduct will be subject to discipline, including possible termination. Although the Company has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about the availability on the Internet of sensitive, personal subscriber information to third parties,

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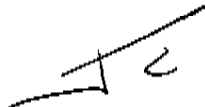
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the Company currently is auditing all of its CPNI policies and procedures and, if necessary, will implement a more comprehensive plan for protecting its customers' confidential information.

The Company uses independent contractors to perform sales functions. Even though these independent contractors do not have any access to a customer's billing records or other CPNI after the sale is completed, the Company contractually requires each independent contractor to have protections in place to ensure the confidentiality of any information that is obtained from Company customers. These contracts further prohibit these independent contractors from using, allowing access to, or disclosing any Company customer information to any other party, unless required to make such disclosure under force of law.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. A significant amount of the Company's marketing is focused on new customers in areas where the Company has built facilities. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of these customer contacts are maintained in Company databases for at least one year. Specifically, the Company utilizes a contact management database that tracks customer contacts made by Company sales and marketing Company employees, and the Company utilizes an account management and trouble ticketing system that documents all contacts with customers. All marketing campaigns are supervised by the Company Business Development Manager, who maintains records of such supervision for at least one year.

Respectfully submitted,


Jeremy Katz
Chief Executive Officer
segTEL, Inc.

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com